

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 04 CR 10220 MLW
)
YVELISSE GONZALEZ RODRIGUEZ)

GOVERNMENT'S MOTION FOR LATE FILING OF SENTENCING MEMORANDUM AND
OPPOSITION TO DEFENDANT'S MOTION FOR DOWNWARD DEPARTURE

The Government hereby moves this Court to accept the late filing of its Sentencing Memorandum and Opposition to Defendant's Motion for Downward Departure. As reasons therefore, the Government states that because it was in full agreement with the sentencing calculations in the Pre-Sentence Report, the Government initially did not file a Sentencing Memorandum by the date set by the Court for the filing of memoranda or motions, March 30, 2006. Beginning on June 1, 2006, and through June 12, 2006, the undersigned Assistant United States Attorney was out of the office for both personal and government-related purposes. Before leaving, the undersigned AUSA assured herself that the Defendant had not filed any Sentencing Memoranda or Motions which would require opposition by the Government. Because the Defendant filed its Sentencing Memorandum and Motion for Downward Departure late, while the undersigned AUSA was out of the office, the Government did not have an opportunity to prepare a response until the undersigned AUSA returned on June 12, 2006.

Accordingly, the Government respectfully requests this Court

to accept this late filing.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Maureen B. Hogan
MAUREEN B. HOGAN
Assistant U.S. Attorney

Dated: June 12, 2006